

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**ROBERT SUTTON,**

**Plaintiff,**

**v.**

**GLOBE ENERGY SERVICES, LLC,**

**Defendant.**

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**CIVIL ACTION NO:**

**5:17-CV-1073**

**NOTICE OF REMOVAL**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT:

COMES NOW Defendant Globe Energy Services, LLC (“Globe”) and files its Notice of Removal. Defendant removes to this Court Case No. D-506-CV-2017-01000, which has been filed in the Fifth Judicial District Court of Lea County, New Mexico. Removal is proper for the following reasons:

1. On September 29, 2017, Defendant was served with Plaintiff’s Complaint for Employment Discrimination (“Complaint”).

2. This Notice of Removal is filed within thirty (30) days of the receipt of service of Plaintiff’s Complaint as required by 28 U.S.C. § 1446(b).

3. Defendant invokes the jurisdiction of the United States District Court for the District of New Mexico. The District Courts of the United States have original jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Plaintiff’s claims arise under federal law. Specifically, Plaintiff asserts federal law claims under the Americans with Disabilities Act, 42 U.S.C. §§ 12101 *et seq.* and for damages under the Family and Medical Leave Act. Because Plaintiff’s claims arise under federal law, removal is proper to the district and division embracing

the place where the action is pending. 28 U.S.C. § 1441(a). Consequently, this case is removable without regard to the citizenship or residence of the parties. 28 U.S.C. § 1441(b). To the extent there are state law claims, this Court has supplemental federal court jurisdiction over those claims. 28 U.S.C. § 1367.

4. Federal jurisdiction also exists pursuant to 28 U.S.C. §§ 1332 and 1441 because this is a dispute between diverse parties of different states and the amount in controversy exceeds \$75,000.

5. A true and correct copy of all process, pleadings and the orders served upon Defendant in the state court action are being filed with this notice, as required by 28 U.S.C. § 1446(a) [Exhibit A].

6. As indicated in the attached Certificate of Service, Defendant is giving the adverse party written notice of the filing of this Notice of Removal, as required by 28 U.S.C. § 1446(d).

7. Defendant is filing a copy of this Notice of Removal this date with the Clerk of the Fifth Judicial District Court of Lea County, New Mexico, as required by 28 U.S.C. § 1446(d).

8. In accordance with D.N.M.LR-Civ. 83.3(a)(1), the undersigned certifies that Russell D. Cawyer of KELLY HART & HALLMAN LLP is a member in good standing of the bar of the State of Texas and will be associating with me in this action. The undersigned will continue to participate and accept service in this action.

WHEREFORE, Defendant requests that the above-entitled action be removed in its entirety from the Fifth Judicial District Court, Lea County, New Mexico, to this Court. Defendant requests any other relief to which it is justly entitled.

Respectfully submitted,

/s/ Anna Brandl

Anna Brandl  
NM Bar No. 149813  
**KELLY HART & HALLMAN LLP**  
508 W. Wall St., Ste. 444  
Midland, Texas 79701  
Telephone (432) 688-0439  
Facsimile (432) 683-6518  
[anna.brandl@kellyhart.com](mailto:anna.brandl@kellyhart.com)

Russell D. Cawyer  
Texas Bar No. 00793482  
**KELLY HART & HALLMAN LLP**  
201 Main Street, Suite 2500  
Fort Worth, Texas 76102  
Telephone (817) 878-3562  
Facsimile (817) 878-9280  
[russell.cawyer@kellyhart.com](mailto:russell.cawyer@kellyhart.com)

**ATTORNEYS FOR DEFENDANT  
GLOBE ENERGY SERVICES, LLC**

**CERTIFICATE OF SERVICE**

On October 27, 2016, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, District of New Mexico, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Anna Brandl

Anna Brandl

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**ROBERT SUTTON,**

**Plaintiff,**

**v.**

**GLOBE ENERGY SERVICES, LLC,**

**Defendant.**

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**CIVIL ACTION NO:**

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**INDEX OF STATE COURT FILINGS**

A-1	State Court Docket Sheet (10/13/17)
A-2	Plaintiff's Complaint for Employment Discrimination (7/25/17)
A-3	Summons issued to Globe Energy Services, LLC (9/22/17)
A-4	Return of Service of Summons (10/9/17)



**Robert Sutton**  
v.  
**Globe Energy Services, LLC**

**CASE DETAIL**

CASE #	CURRENT JUDGE	FILING DATE	COURT
D-506-CV-201701000	Clingman, Gary L.	07/25/2017	LOVINGTON District

**PARTIES TO THIS CASE**

PARTY TYPE	PARTY DESCRIPTION	PARTY #	PARTY NAME
D	Defendant	1	GLOBE ENERGY SERVICES, LLC
P	Plaintiff	1	SUTTON ROBERT

ATTORNEY: RUSSELL TARYN SHENELL

**CIVIL COMPLAINT DETAIL**

COMPLAINT DATE	COMPLAINT SEQ #	COMPLAINT DESCRIPTION	DISP	DISP DATE
07/25/2017	1	OPN: COMPLAINT		

COA SEQ #	COA DESCRIPTION
1	Miscellaneous

PARTY NAME	PARTY TYPE	PARTY #
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**REGISTER OF ACTIONS ACTIVITY**

EVENT DATE	EVENT DESCRIPTION	EVENT RESULT	PARTY TYPE	PARTY #	AMOUNT
10/09/2017	SUMMONS RETURN	D		1	
09/22/2017	SUMMONS ISSUED	D		1	
09/22/2017					
07/25/2017	OPN: COMPLAINT				

**JUDGE ASSIGNMENT HISTORY**

ASSIGNMENT DATE	JUDGE NAME	SEQ #	ASSIGNMENT EVENT DESCRIPTION
07/25/2017	Clingman, Gary L.	1	INITIAL ASSIGNMENT



STATE OF NEW MEXICO  
COUNTY OF LEA  
FIFTH JUDICIAL DISTRICT COURT

FILED IN MY OFFICE  
DISTRICT COURT CLERK  
7/25/2017 4:54:15 PM  
NELDA CUELLAR  
Sandy Long

ROBERT SUTTON,

Plaintiff,

D-506-CV-2017-01000

vs.

Case No. \_\_\_\_\_

GLOBE ENERGY SERVICES, LLC,

Case assigned to Clingman, Gary L.

Defendant.

**COMPLAINT FOR EMPLOYMENT DISCRIMINATION**

COMES NOW Plaintiff, Robert Sutton, by and through his counsel, Ragsdale Law Firm (Luke W. Ragsdale and Taryn S. Russell), and hereby submits his Complaint for Employment Discrimination:

**Jurisdiction and Venue**

1. Plaintiff is a resident of the City of Hobbs, County of Lea, State of New Mexico, and has been for more than six months prior to the filing of this Complaint.
2. Defendant Globe Energy Services, LLC ("Globe Energy") is a Texas limited liability company licensed to conduct business in the state of New Mexico and operating an office in the City of Hobbs, County of Lea, State of New Mexico.
3. This Court has jurisdiction over the parties and subject matter involved in this lawsuit.
4. Venue is proper in the Lea County District Court.

**General Allegations**

5. Plaintiff was employed by Globe Energy from June 21, 2012, until January 9, 2015.



6. In November 2014, Plaintiff became ill. When Plaintiff presented to the emergency room, he was diagnosed with a ruptured ulcer in his abdomen, which had precipitated serious internal bleeding.

7. Plaintiff underwent emergency surgery in November 2014.

8. Plaintiff was on paid leave for several weeks while he was in the hospital and then recovering at home.

9. Plaintiff returned to work on or around January 8, 2015.

10. Plaintiff's doctor had released Plaintiff to return to work with the understanding that Plaintiff would be on light work duty. Plaintiff provided his supervisor at Globe Energy with orders from the doctor.

11. On Plaintiff's first day back at work, he was sent out to approximately four or five locations. He was tasked with picking up tools from pulling units, which involved lifting loads over 100 pounds. The trips also involved rough travel on road that were not maintained.

12. Plaintiff informed a supervisor that he could not handle any more trips that day and needed to go home. Plaintiff was told he needed to see a doctor and get a note if he was going to leave before the end of his shift.

13. Plaintiff went to his doctor, who sent him back with a note stating that Plaintiff should lift no more than ten pounds and should avoid jarring movements.

14. When Plaintiff returned with the note, his supervisor was out of the office. Plaintiff was told to return the next morning to meet with Glenn Coates.

15. When Plaintiff met with Mr. Coates on January 9, 2015, Mr. Coates asked Plaintiff to resign.

16. After Plaintiff refused to resign, he was terminated from his employment with Globe Energy.

17. Plaintiff exhausted his administrative remedies by filing a Charge of Discrimination with the Equal Employment Opportunity Commission in a timely fashion.

18. The EEOC issued Plaintiff a Notice of Right to Sue on April 26, 2017.

19. Due to his termination, Plaintiff has suffered significant damages, including, but not limited to, lost wages, loss of retirement benefits, loss of health insurance for himself and his family, and pain and suffering.

**Claim I: Violation of the Americans with Disabilities Act**

20. At all times relevant to the events at issue in this lawsuit, Plaintiff suffered from a physical impairment that qualifies as a disability within the meaning of the Americans with Disabilities Act.

21. Defendant terminated Plaintiff's employment due to Plaintiff's disability.

22. Plaintiff was qualified to perform the essential functions of his position with reasonable accommodations.

23. Defendant failed to attempt to provide Plaintiff with reasonable accommodations.

24. Defendant discriminated against Plaintiff in violation of the ADA.

25. Defendant is liable to Plaintiff for damages suffered as a result of said discrimination.



**Claim II: Violation of the New Mexico Human Rights Act**

26. At all times relevant to the events at issue in this lawsuit, Plaintiff suffered from a serious medical condition as defined by the New Mexico Human Rights Act ("NMHRA").

27. Defendant took adverse action against Plaintiff on the basis of Plaintiff's disability or serious medical condition. Such adverse action included a failure to accommodate Plaintiff's condition and the subsequent termination of Plaintiff's employment.

28. Defendant's conduct violated the terms of the NMHRA.

29. Defendant is liable to Plaintiff for damages caused by Defendant's violations of the NMHRA.

**Claim III: Violation of the Family Medical Leave Act**

30. At all times relevant to the events at issue in this lawsuit, Plaintiff was eligible for leave under the Family Medical Leave Act ("FMLA").

31. At all relevant times, Defendant was subject to the terms of the FMLA.

32. Plaintiff suffered from a serious health condition, entitling him to leave under the FMLA.

33. At the time of Plaintiff's termination, Plaintiff had not exhausted the twelve (12) weeks of leave allowed by the FMLA.

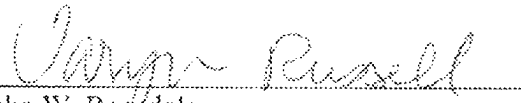
34. Defendant interfered with Plaintiff's ability to take leave as allowed by the FMLA.

35. Defendant's refusal to allow additional leave and decision to terminate Plaintiff's employment violated the FMLA.

36. Defendant is liable to Plaintiff for damages suffered as a result of Defendant's violation of the FMLA.

WHEREFORE, Plaintiff prays this Court enter judgment in Plaintiff's favor with respect to the claims in Plaintiff's Complaint; award Plaintiff damages in an amount to be proved at trial; and grant such other and further relief as this Court deems fair and appropriate.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Taryn S. Russell", is written over a horizontal dotted line.

Luke W. Ragsdale  
Taryn S. Russell  
Ragsdale Law Firm  
P.O. Box 3220  
Roswell, NM 88202-3220  
(575) 208-5300  
*Attorneys for Plaintiff*

SUMMONS	
<b>Fifth Judicial District Court</b> <b>Lea County New Mexico</b> <b>Court Address: 100 N Main</b> <b>Lovington, NM 88260</b> <b>Court Telephone No.:575-396-8571</b>	Case Number: D-506-CV-2017-01000  Judge: Gary L. Clingman
<b>ROBERT SUTTON,</b>  Plaintiff,  vs.  <b>GLOBE ENERGY SERVICES, LLC,</b>  Defendant.	Defendant:  Name: National Registered Agents Inc c/o Globe Energy Services, LLC  Address: 206 S Coronado Ave Espanola, NM 87532

**TO THE ABOVE NAMED DEFENDANT/DEFENDANTS:** Take notice that

1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date you are considered served with the Summons is determined by Rule 1-004 NMRA.) The Court's address is listed above.
3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.
4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.
5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.
6. If you need an interpreter, you must ask for one in writing.
7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at [www.nmbar.org](http://www.nmbar.org); 1-800-876-6657; or 1-505-797-6066.

Dated at Lovington, New Mexico, this 22nd day of September, 20 17.

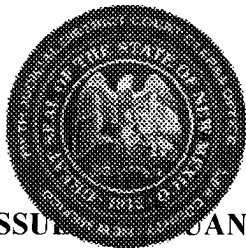
CLERK OF COURT

By: 

Deputy

/s/ Luke W. Ragsdale

Luke W. Ragsdale  
 Ragsdale Law Firm  
 P. O. Box 3220  
 Roswell, NM 88202-3220  
 (575) 208-5300; Fax (575) 208-5828  
[luke@ragsdalclawfirm.com](mailto:luke@ragsdalclawfirm.com)



**THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO  
 RULES OF CIVIL PROCEDURE FOR DISTRICT COURT.**

ORIGINAL: To Be Returned to Clerk of District Court for Filing.

Official Title:

SUMMONS	
<b>Fifth Judicial District Court</b> <b>Lea County New Mexico</b> <b>Court Address: 100 N Main</b> <b>Lovington, NM 88260</b> <b>Court Telephone No.: 575-396-8571</b>	Case Number: D-506-CV-2017-01000  Judge: Gary L. Clingman  Defendant:  Name: National Registered Agents Inc c/o Globe Energy Services, LLC  Address: 206 S Coronado Ave Espanola, NM 87532
ROBERT SUTTON,  Plaintiff,  vs.  GLOBE ENERGY SERVICES, LLC,  Defendant.	FILED IN MY OFFICE DISTRICT COURT CLERK 10/9/2017 3:34:17 PM NELDA CUELLAR Jennifer Salcido

**TO THE ABOVE NAMED DEFENDANT/DEFENDANTS:** Take notice that

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Dated at Lovington, New Mexico, this 22nd day of September, 20 17.

CLERK OF COURT

By: 

Deputy

/s/ Luke W. Ragsdale

Luke W. Ragsdale  
 Ragsdale Law Firm  
 P. O. Box 3220  
 Roswell, NM 88202-3220  
 (575) 208-5300; Fax (575) 208-5828  
[luke@ragsdalelawfirm.com](mailto:luke@ragsdalelawfirm.com)



**THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO  
 RULES OF CIVIL PROCEDURE FOR DISTRICT COURT.**

ORIGINAL: To Be Returned to Clerk of District Court for Filing.



## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Robert Sutton,

(b) County of Residence of First Listed Plaintiff Lea  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
Luke Ragsdale and Taryn S. Russell, Ragsdale Law Firm,  
P.O. Box 3220, Roswell, NM 88202-3220; (575) 208-5300

**DEFENDANTS**

Globe Energy Services, LLC

County of Residence of First Listed Defendant \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)  
Anna Brandl and Russell D. Cawyer, Kelly Hart & Hallman, LLP,  
508 W. Wall St., Ste. 444, Midland, Texas 79701; (432) 688-0439

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question  
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input checked="" type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
42 U.S.C. s 12101 et seq.

Brief description of cause:  
Disability discrimination

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ \_\_\_\_\_

CHECK YES only if demanded in complaint:  
JURY DEMAND: ☐ Yes ☒ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

DATE

10/27/2017

SIGNATURE OF ATTORNEY OF RECORD

/s/ Anna Brandl

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_

AMOUNT \_\_\_\_\_

APPLYING IFP \_\_\_\_\_

JUDGE \_\_\_\_\_

MAG. JUDGE \_\_\_\_\_